

JIM AND KIM KELLY NAQUIN  
19415 INDIAN GRASS  
KATY, TEXAS 77449

Archer

20515

FEB 12 1993

RECEIVED

MAR - 8 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Archer

I am an avid model airplane flyer. I derive many hours of enjoyment constructing and operating radio control model planes. I am very active in a local club which has access to a county park flying field (Scobee Field, Houston Tx.).

I am also a Professional Engineer by trade and I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If Adopted, The new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72 - 75 MHz band. This band is primarily used for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

The FCC wants to create more mobile frequencies by splitting them into narrower bandwidths and rearranging the plan. As a result, many land mobile frequencies will move closer to the radio control frequencies and cause interference to radio control operations. I am told that of the 50 frequencies that are presently available for model airplanes, only 19 frequencies will be left if these new rules are adopted.

When we fly model airplanes under radio control, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of radio control frequencies. If the number of usable frequencies diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly decreased.

Please understand that many model airplanes have wingspans of up to 10 feet and weigh as much as 30 or 40 pounds. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models at organized events and contests where hundreds of operators participate. We need the use of our full complement of frequencies in order to assure a safe flying environment.

I do not think it is of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Sincerely,

*James S. Naquin*

OD  
JAN 26 1993

RECEIVED

The Honorable: Bill Archer  
1003 Wirt  
Houston, tx 77055

Jan 26, 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr: Archer

I am a very active ~~radio control modeler~~ having been in the hobby more than 10 years. I personally own 4 radios, 5 R/C airplanes and a work shop full of other products necessary to operating my aircraft.

I am very concerned about the proposed rule that is currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docker 92-235. If adopted the new rule will greatly reduce the usability of frequencies currently assigned for R/C model use and increase the risk of accidents and attendant liability.

Our radio control frequencies are in the 72-76 MHz band. This band is primarily used for private land mobile operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

The Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of the rules with a new Part 88. Part 90 allows safe use of R/C aircraft and surface models by keeping 10 KHz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 KHz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on the 72 MHz band (for R/C aircraft) and 10 of the 30 frequencies on the 75 MHz band (for R/C cars and boats) now used by hobbyists. In fact, more channels will likely be affected.

When we operate our R/C models, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly decreased.

I don't think it is wise of the FCC to seek to expand the operation conditions of land mobile radio users at the expense of the radio control modelers. The FCC may not think we are as important as business users of radio, but we have a considerable investment in our models and in our radio equipment. It is a sizeable industry that must be saved from these detrimental FCC actions. The hobby provides many hours of enjoyment to hundreds of thousands of people like myself and contributes to the advancement and development of the commercial aviation industry. The most important thing about this hobby that I can see is that it gives

our children something safer and better to do with their time than run the roads as so many do today!

Please help me and my fellow modelers continue the safe enjoyment of my (our) pasttime by not allowing the FCC to carry out its proposal PR Docket 92-235 for the 72-76 MHz band. We all need your help urgently because the FCC has a deadline of February 26, 1993 after which it may become more difficult to halt these proposals from going into effect.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bill Allen".

56 CREST BRIAR  
BAYTOWN TX 77521

Jon B. Beard  
10559 Waving Fields  
Houston, TX 77064

February 4, 1993

The Honorable Bill Archer  
U. S. House of Representatives  
Washington, D. C. 20515

Dear Mr. Archer,

As a model airplane enthusiast who derives great pleasure from the operation of such, I am quite concerned about a matter which could have serious implications, not only to myself, but to many thousands of others, as well.

It has been brought to my attention that an FCC Proposed Rule, numbered PR Docket 92-235, has been introduced that will have a detrimental effect on our sport, as a whole. In effect, this Proposed Rule will insert land mobile frequencies between, and in some cases on top of, those used by operators of radio controlled (r/c) aircraft. The result of this will be to cause interference of r/c operations by these land mobile operators. I am told that of the fifty (50) frequencies currently available for r/c use in the 72-76 MHz band, only nineteen (19) would remain if the new rules are adopted. This could cause enormous congestion of channels and would lead to diminished safety.

It is important to understand, too, that these r/c airplanes can have wingspans as large as ten (10) feet and can weigh as much as as forty (40) pounds. We who fly these aircraft go to great lengths to insure the safety of pilots, spectators and personal property. One of the precautions we take is to carefully coordinate the use of our r/c frequencies. As you can imagine, losing control of an aircraft of the size mentioned can cause immense property damage, serious injury or even death. This loss of control can easily occur if our r/c channels receive interference from land mobile operators. This is true for a weekend outing with only a few pilots or at an organized contest where there could be hundreds of pilots and spectators.

I do not think it is wise of the FCC to seek to improve the operating conditions of land mobile users at the expense of r/c modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

RECEIVED  
FEB 12 1993  
MAR - 8 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Sincerely,

Jon B. Beard

Don Ginzel  
1818 MAIN ST. #10  
LAMARQUE, TX 77568

The Honorable Bill Archer  
The U.S. House of Representatives  
Washington, DC

29 Jan 1993

RECEIVED

MAR - 8 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Congressman Archer:

My name is Don Ginzel. I am a member of the Academy of Model Aeronautics, and am active in the hobby of remote control model aircraft. I currently own two ready to fly planes, and am working on a third.

I am writing to you about some proposed rules under consideration by the FCC. The proceeding is PR Docket 92-235. If it is adopted it will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model aircraft.

Our radio control frequencies are in the 72-76 MHz band. This band is primarily used for land mobile dispatch operations. However our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result many land mobile frequencies will move closer to the radio control

frequencies. I am told that of the 50 frequencies that are presently available for radio control, only 19 frequencies will be left if these rules are adopted.

When we fly our planes under radio control, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and safety will be greatly reduced.

Please understand that many model planes have wing spans of up to 10 feet and can weigh over 30 pounds. Even a modest sized plane can have an engine that has as much power as a lawnmower and reach speeds of 100 MPH. The models are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models in organized events and contests where hundreds of operators participate. We need the use of our full complement of radio frequencies in order to assure a safe flying environment.

I do not think it wise of the FCC to seek to improve

the operating conditions of land mobile radio users at the expense of radio control modelers.

Please help us continue the safe enjoyment of our hobby by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Respectfully yours

Don Dingel



~~The~~ Honorable Bill Archer  
United States House of Representatives  
1236 Longworth Office Building  
Washington, DC 20515

February 5, 1993

RECEIVED  
MAR - 8 1993  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Archer:

I am an aviation enthusiast who gets many hours of pleasure from building and flying radio controlled model airplanes. My enjoyment of aviation started over 40 years ago when I began flying model airplanes on the schoolyard near my home. Since then it has grown to include becoming a private pilot and flying radio controlled models. When I retire in a few years, I hope to spend even more time in this hobby.

I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and liability for controlling model airplanes. Please help me to continue enjoying my hobby by not allowing the FCC to adopt this proposal.

Our radio control frequencies are in the 72 - 76 MHz band. This band is used primarily for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land mobile frequencies will move closer to the radio control frequencies and cause interference to radio control operations. I am told that of the 50 frequencies that presently are available for radio control of model airplanes, only 19 frequencies will be left if these new rules are adopted.

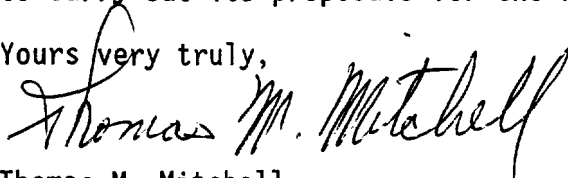
When we fly our model airplanes under radio control, we go to extreme lengths to assure the safety of the operators and bystanders, and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly decreased.

Please understand that many model airplanes have wing spans of 10 feet or more and weigh as much as 30 or 40 pounds. They often fly at speeds of 50 mph or more. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models at organized events and contests where hundreds of operators participate. We need the use of our full complement of radio frequencies in order to assure a safe flying environment.

I do not think it is wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our models and in our radio equipment. The hobby provides many hours of enjoyment for thousands of people like myself and contributes millions of dollars annually to the U. S. economy.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72 - 76 MHz band.

Yours very truly,

A handwritten signature in cursive script that reads "Thomas M. Mitchell". The signature is written in dark ink and is positioned below the typed name.

Thomas M. Mitchell  
11831 Chase Lake Drive  
Houston, Texas 77077

~~FEB 3 1993~~

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29 **RECEIVED**

The Honorable Bill Archer  
The U.S. House of Representatives  
Washington, DC

**MAR - 8 1993**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Congressman Archer

My name is Tom Gardin. I am a member of the Academy of Model Aeronautics, and am active in the hobby of remote control model aircraft. I currently own two ready to fly planes, and am working on a third.

I am writing to you about some proposed rules under consideration by the FCC. The proceeding is PR Docket 92-235. If it is adopted it will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model aircraft.

Our radio control frequencies are in the 72-76 MHz band. This band is primarily used for land mobile dispatch operations. However our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result many land mobile frequencies will move closer to the radio control frequencies. I am told that of the 50 frequencies that are

presently available for radio control, only 19 frequencies will be left if these rules are adopted. To give you an ideal of what were talking about here, to avoid interference television channels are separated by about 1,000,000 Hz, FM radio stations are separated by 200,000 Hz, cellphones are separated by 30,000 Hz. If this rule is passed our radio control frequencies will be separated from land mobile use by only 2,500 Hz.

When we fly our planes under radio control, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and safety will be greatly reduced.

Please understand that many model planes have wing spans of up to 10 feet and can weigh over 30 pounds. Even a modest sized plane can have an engine that has as much power as a lawnmower and reach speeds of 100 MPH. The models are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models in organized events and contest where hundreds of operators participate. We need the use of our full complement of

radio frequencies in order to assure a safe flying environment.

I do not think it wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers.

Please help us continue the safe enjoyment of our hobby by not allowing the FCC to carry out its proposals for the 72-76 MHz band.

Respectly yours

*Thomas L. Gardin*

Tom Gardin  
1426 14th Ave. N.  
Texas City, Tx. 77590

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FEB 4 1993

RECEIVED

MAR - 8 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

7806 Round Bank Dr.  
Houston, TX 77064  
Jan. 29, 1993

The Honorable Bill Archer  
U.S. House of Representatives  
Washington, D.C. 20515

Reference: FCC Notice of Proposed Rule Making  
(NPRM -PR Docket 92-235)

Dear Sir:

The referenced FCC notice proposes to change the frequency spacing of only 2.5 Kiloherztz (KHZ) in the 72 and 75 megahertz (MHZ) bands. The 72 and 75 MHZ bands are currently being used by radio controlled model aircraft enthusiasts and commercial land mobile service on a 10KHZ spacing which is satisfactory.

The proposed change to 2.5 KHZ spacing would be too close to R/C assigned frequencies for safety. It would be too costly to modify an R/C radio for 2.5 KHZ spacing.

I am enclosing a copy of my letter to the FCC explaining the devastating impact, financially and psychologically on thousands of R/C flyers if this frequency spacing is enacted.

Please help to prevent this change by the FCC. The FCC meeting is Feb. 26, 1993

Sincerely,

*Thomas H. Clark Jr.*  
Thomas H. Clark, Jr.

7806 Round Bank Dr.  
Houston, TX 77064  
Jan. 29, 1993

**RECEIVED**

**MAR - 8 1993**

Federal Communication Commission  
1919 M Street NW  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Reference: NPRM- PR Docket 92-235

To Whom It May Concern:

I am strongly opposed to the modification of user allocation in our frequency band of 72 and 75 MHZ as dictated in NPRM - PR Docket 92-235 as it relates to part 95.

I am retired and 70 years old. I derive many hours of enjoyment from building and flying radio controlled model airplanes. This hobby is one thing I had to postpone for 45 years due to family obligations. I am active in two R/C clubs each of which invested thousands of dollars developing flying sites in areas that do not endanger the public.

There are over 6 other clubs in the Houston area. All clubs host charity money-raising air shows once a year for over 500 persons of the general public plus 20-30 pilots and their assistants.

I own 10 airplanes with wing spans from 4 to 9 feet and weighing 7 to 25 pounds with engines from .25 to 3.0 cubic inches for a total cost of about \$5000.00 of which \$2000.00 is radio cost.

Inserting more commercial frequencies in the band between 72 and 75 MHZ would result in greatly reduced safety in the operation of radio controlled aircraft. Many of these aircraft approach 50 lbs in weight and travel at speeds in excess of 100 miles/hour. The absolute reliability of our control systems is essential to the safety of our participants, as well as the safety of the general public.

Further, to purchase new radio equipment which could be reliable in the presence of strong commercial signals only 2.5 KHZ from our own frequencies would be prohibitive in cost. I have already had to up-date my radios to meet the 1991 specifications of 10 KHZ spacing requirements at about \$1500.00 cost.



Increase costs for new radios to meet 2.5 KHZ spacing would force many R/C club members to fly "illegally" with old existing equipment in unsecured area such as parking lots, school yards, road sides and open fields which would present a real and potentially lethal hazard to the public. This hazard is needless and could be wide-spread due to the thousands of R/C enthusiasts in the United States.

Certainly a new frequency band could be developed for land mobile units that would not interfere with the current R/C frequencies allocated.

Please help me to continue safe enjoyment of my full time hobby that I worked so long (45 years) to be able to afford and that I have so little time left to enjoy. Remember, man does not live by bread alone.

I trust the FCC will be considerate of all R/C fliers by becoming kinder and gentler in its actions and retain the 10 KHZ spacing in the 72 and 75 MHZ bands.

Sincerely,

*Thomas H. Clark Jr*  
Thomas H. Clark, Jr.

FEB 3 1993

RE: \_\_\_\_\_

TO: \_\_\_\_\_

FROM: \_\_\_\_\_

January 26, 1993

RECEIVED

MAR - 8 1993

The Honorable Bill Archer  
US House of Representatives  
Washington, D.C. 20515

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: FCC  
NPRM-PR Docket 92-235  
Infringement on Model Aviation

Dear Senator:

It has just been brought to my attention that the above Notice of Proposed Rule Making has been released. This creates a great danger to my sport, Radio Control Model Aviation.

In 1991, we were forced to update our radios to a higher quality "narrow" band on our transmitters. We are now informed that the telephone and pager industry desires to insert two (2) frequencies in between the channels designated solely to radio control model aviation. We are already experiencing the following:

1. Effective 1991, we had to spend money on "narrow" band transmitters and receivers because additional channels were granted.
2. Manufacturers spent a lot of money on electronics to accomplish No. 1;
3. We still get "hits" on our airplanes in many locations from pagers and microwave transmission towers; and
4. Crashes have increased due to radio interference.

Lehmann & Associates
Attorneys at Law
4511 Dacoma
Houston, Texas
77092
FAX (713) 957-4178
(713) 957-2800

Jeffrey A. Lehmann

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The Honorable Bill Archer  
January 26, 1993  
Page 2

MAR - 8 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The FCC is now being pressured/lobbied to insert two (2) channels in between the ones we have now. This will be promoted as "safe and possible". But the truth is that R/C Modelers will have to pay not about \$100.00 for a good quality, but \$1,000.00 or more for a highly sophisticated radio. Also, the people who transmit on telephones and pagers always seem to "bleed over" and cannot stay in their narrow bands. This means that the R/C model aviation business will be drastically impaired to the point where no one can enjoy the sport.

The result will be the sales loss of some 1/2 million buyers who by engines, motors, kits and accessories. Retailers, distributors, exporters and other related industries will be jobless.

Safety problems will increase dramatically. We now typically fly model aircraft up to 55 pounds and small craft are flown in school yards. Random kits from beepers and cellular phones are a problem now--to insert more frequencies next to that of the R/C sport will make it worse.

I have been involved in R/C aircraft for 23 years. I have been "shot down" twice only to learn that a certain beeper or pager tower was nearby after the crash.

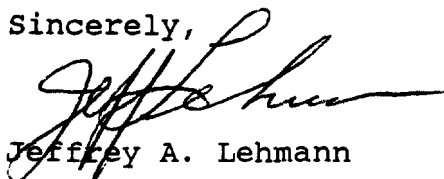
If any more crowding of the 72 and 75 MHz frequency band is allowed, it will be unfortunate for a great, clean sport and who knows how many jobs. The model aviation industry has worked hard at being a good neighbor and we need to keep our frequencies of 72 and 75 MHz for ourselves.

Will you please use your influence to move the cellular and telecommunication to some other frequency. They probably have hundreds and millions of dollars to spend on radios--we don't.

The Honorable Bill Archer  
January 26, 1993  
Page 3

Thank you for your help.

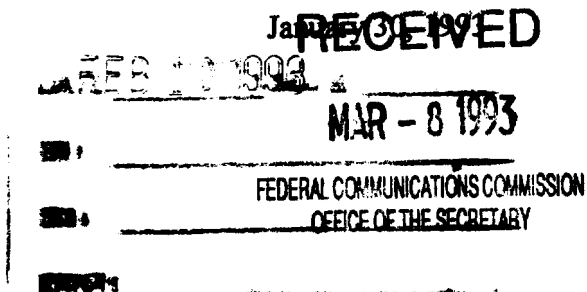
Sincerely,

A handwritten signature in cursive script, appearing to read "Jeff Lehmann", written over the printed name.

Jeffrey A. Lehmann

The Honorable Bill Archer  
United States House of Representatives  
Washington, D.C. 20515

Dear Mr. Archer,



**I AM OPPOSED TO FCC PROPOSED RULES, PR DOCKET 92-235**

I am a member of a model airplane club which flies scale and sport models by radio control. We, the members of the club, derive a great deal of enjoyment from this hobby. Additionally, we also find it a convenient and stimulating means of educating young people in the 6th- to 12th-grade range in the technical and scientific areas. For example, most students find learning mathematics, physics, electronics, chemistry and computer applications much easier when they see how it can apply to a real world application such as aviation--which they can readily do through application to models. All in all, it is a very enjoyable hobby and a powerful educational tool.

I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use. Consequently, this will also reduce the high level of safety which is inherent in the model airplane hobby by resulting in congested frequencies and possible interference from new users.

Our radio control frequencies are in the 72 to 76 MHz band. This band is primarily used for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

However, the FCC is proposing to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land mobile frequencies will move closer to the radio control frequencies and cause interference to radio control operations. Of the 50 frequencies that are presently available for radio control of model airplanes, only about 19 frequencies will be left if these new rules are adopted.

When we fly our model airplanes under radio control, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will potentially be decreased.

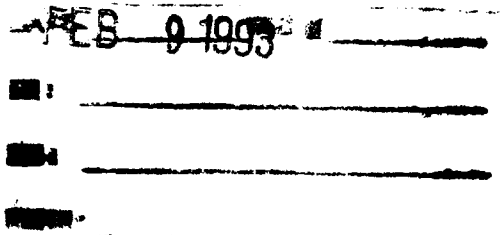
I am strongly opposed to the FCC seeking to improve the operating conditions of land mobile radio users at the expense of radio control modelers. We have a considerable investment in our models and in our radio equipment, and the hobby provides many hours of enjoyment to thousands of people like myself. Additionally, and more importantly, the hobby contributes to the general and technical education of many young students who share this hobby with their parents and/or other responsible adults.

Please help me continue the safe enjoyment of this hobby, and to preserve this excellent educational tool, by not allowing the FCC to carry out its proposals for the 72 to 76 MHz band.

Sincerely,

A handwritten signature in cursive script, appearing to read "J B Dansby".

J. B. Dansby, Ph.D., P.E.  
6719 Falling Waters Drive  
Spring, Texas 77379



January 29, 1993

The Honorable Bill Archer  
United States House of Representatives  
Washington, D.C. 20515

**RECEIVED**

**MAR - 8 1993**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Representative Archer:

I am a member of the Space City R/C Club, a group of over 100 radio control airplane enthusiasts. We own a ten acre flying site near Houston, representing an investment of over \$50,000. This site plays host to our members who have an avid devotion to the sport of flying radio controlled aircraft. Further, we hold a charity money-raising air show once each year in which our site and club host over 500 members of the general public, as well as the pilots and their assistants. This event raises money for the Sunshine Kids, an organization dedicated to bringing some fun into the lives of children battling cancer.

My fellow club members and I object strongly to the modifications of the radio user allocation in our portion of the radio band, as proposed in FCC Notice of Proposed Rulemaking NPRM-PR Docket 92-235, particularly as it relates to Part 95. I am writing to you to enlist any and all assistance you and your staff can provide to defeat implementation of these modifications, for the reasons stated below.

Our portion of the radio band lies between 72 and 73 mega-Hertz (MHz). We have been sharing this band with land mobile dispatch operations, but to date this has been satisfactory because our radio control frequencies are spaced far enough apart from the land mobile frequencies to avoid radio interference. The proposed FCC modifications would insert more commercial frequencies in the radio band between 72 and 73 MHz. They would accomplish this by splitting the frequencies in this band into narrower bandwidths and rearranging the band plan. As a result, many land mobile frequencies would move closer to the radio control frequencies and cause interference to radio control operations. I am told that of the fifty frequencies that are presently available for radio control of model airplanes, only nineteen frequencies would be left if the proposed rules are adopted.

This would result in greatly reduced safety in the operation of radio controlled aircraft. Many of these aircraft approach fifty pounds in weight, and travel at speeds in excess of 100 miles per hour. The absolute reliability of our radio control systems is essential to the safety of our participants, as well as the safety of the general public.

Further, to re-equip ourselves with new radio gear which could be deemed reliable in the presence of strong commercial signals only 2.5 kilo-Hertz (KHz) from our own channels would be extremely prohibitive in cost, especially considering that all of our members have just completed upgrading their radio equipment to meet 1991 10 KHz spacing requirements. New radios to meet the 10 KHz requirements cost from \$200 to over \$1000 each. How much more would we be forced to spend to purchase new, even more sophisticated equipment? Many members would not be able to afford such new equipment, and would leave the club to fly "illegally" with their old equipment in unsecured areas such as parking lots, schoolyards and roadsides, which would present a real and potentially lethal hazard to the public. This hazard could be quite widespread, owing to the over 200,000 R/C enthusiasts in the U.S. Our club of over 100 members is only one of over a dozen in the greater Houston area. The point is that this hazard is needless, if the proposed FCC action is prohibited.

I ask that you, in the interest of safety and in the interest of avoiding a disastrous economic impact on many of your constituents, bring your influence to bear on this issue. Please "step up to the plate" for us in opposing implementation of FCC NPRM-PR Docket 92-235, as it relates to Part 95, and help us retain the 10 KHz spacing in the radio spectrum between 72 and 73 MHz.

Thank you very much for any help you can provide.

Warmest regards,

*Allan B. Quiat*

Allan B. Quiat  
5018 Hastingwood Drive  
Houston, TX 77084



January 21, 1993

*Bill Cisher*

FEB 10 1993

RECEIVED

MAR - 8 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Gentlemen:

I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72-76 Mhz band. This band is primarily used for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land mobile will move closer to the radio control frequencies and cause interference to radio control operations. I am told that of the 50 frequencies that are presently available for radio control of model airplanes, only 19 frequencies will be left if these new rules are adopted.

Please understand that many model airplanes have wing spans up to 10 feet and weigh as much as 30 or 40 pounds. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models at organized events and contests where hundreds of operators participate. We need the use of our full complement of radio frequencies in order to assure a safe flying environment.

I do not think it is wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. I have a considerable investment that would be rendered unusable if PR Docket 92-235 is adopted. The hobby provides many hours of enjoyment to thousands of people like myself and contributes to the advancement and development of the commercial aviation industry.

Please help me continue the safe enjoyment of my pastime by not allowing the FCC to carry out its proposals for the 72-76 Mhz band.

Sincerely,

*Donald D Davis*



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